



January 23, 2014

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FEC MAIL CENTER

Mr. Paul Stoetzer
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Stoetzer:

Pharmavite LLC Political Action Committee (Pharmavite PAC) is in receipt of your Request for Additional Information dated January 10, 2014, regarding our amended Form 1 Statement of Organization.

In Advisory Opinion 2004-42, Pharmavite PAC counsel Robert K. Kelner asked whether this committee could be named Pharmavite LLC Political Action Committee, even though its connected organization is Otsuka America, Inc. (OAI). The Commission noted in this Advisory Opinion that Pharmavite is in the position of a subsidiary because it is a wholly corporate-owned LLC treated as a partnership under Commission regulations. The Commission also noted that "[a]lthough Pharmavite cannot serve as the PAC's connected organization, it may perform the functions of a connected organization because it is in the same position of a subsidiary of OAI." Further, the Commission explained that "because OAI must be listed in the PAC's statement of organization as the PAC's connected organization, OAI's relationship to the PAC will be disclosed to the public."

Therefore, the Commission concluded that "because Pharmavite is in the position of the connected organization's subsidiary and because naming the PAC after Pharmavite will give the public a more accurate understanding of the PAC's funding and purpose, the SSF may be named after Pharmavite instead of its connected organization."

Accordingly, the Pharmavite PAC Form 1 was correct as filed, and no amendment is required.

Sincerely:

A handwritten signature in black ink, appearing to read "John Wilson", written over a horizontal line.

John Wilson, Treasurer
Pharmavite, LLC Political Action Committee

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